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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, *et al.*,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

Jointly Administered

**WITHDRAWAL OF RESPONSE**

Pursuant to the Joint Stipulation and Agreed Order Compromising and Allowing Proofs of Claim Numbers 10231, 10232, and 16416, and Withdrawing Proof of Claim Number 10251 and Reclamation Claim Number 580 (Motion Industries, Inc.), dated September 4, 2007, Motion Industries, Inc., by and through its undersigned attorneys, hereby withdraws with prejudice its Response to Debtors' Thirteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. §502(B) And Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Protective Insurance Claims, (D) Insurance Claims Not Reflected On Debtors' Books And Records, (E) Untimely Claims And Untimely Tax Claims, And (F) Claims Subject To Modification, Tax Claims Subject To Modification, And Claims Subject To Modification And Reclamation Agreement (Docket No. 8004).

Dated: September 10, 2007

Respectfully Submitted,

/s/ William J. Barrett  
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Attorneys for Motion Industries, Inc.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Withdrawal of Response to Debtors' Thirteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. §502(B) and Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Protective Insurance Claims, (D) Insurance Claims Not Reflected On Debtors' Books And Records, (D) Untimely Claims And Untimely Tax Claims, And (F) Claims Subject To Modification, Tax Claims Subject To Modification, And Claims Subject To Modification And Reclamation Agreement was filed electronically this 10<sup>th</sup> day of September, 2007 and the foregoing was sent via e-mail or overnight delivery to the following parties:

Delphi Corporation  
5725 Delphi Drive  
Troy, Michigan 48098  
Attn: General Counsel  
(*served via overnight courier*)

Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Bankruptcy Court for the  
Southern District of New York  
One Bowling Green, Room 610  
New York, New York 10004  
(*served via overnight courier*)

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